

# **EXHIBIT 11**

Excerpts from Voris's Depositions

**In the Matter of:**

*Very Reverend Georges F. de Laire, J.C.L. vs  
Gary Michael Voris, et al.*

---

*Gary Michael Voris*

*March 02, 2022*

---

*68 Commercial Wharf • Boston, MA 02110  
888.825.3376 - 617.399.0130  
Global Coverage  
court-reporting.com*



Very Reverend Georges F. de Laire, J.C.L.,  
Gary Michael Voris, et al.

Gary Michael Voris  
March 02, 2022

4

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW HAMPSHIRE  
3 CIVIL ACTION NO. 1:21-cv-00131-JD  
4 -----X  
5 VERY REVEREND GEORGES F. de  
6 LAIRE, J.C.L.,  
7 Plaintiff,  
8 v.  
9 GARY MICHAEL VORIS, ANITA CAREY,  
10 ST. MICHAEL'S MEDIA a/k/a CHURCH  
11 MILITANT,  
12 Defendants.  
13 -----X  
14 VIDEOTAPED 30(B)(6) DEPOSITION OF ST. MICHAEL'S MEDIA  
15 A/K/A CHURCH MILITANT BY GARY MICHAEL VORIS,  
16 AND GARY MICHAEL VORIS, INDIVIDUALLY  
17 Conducted Remotely  
18 2900 Hilton Road  
19 Ferndale, Michigan  
20 March 2, 2022  
21 9:27 a.m. to 3:49 p.m.  
22  
23  
24 Reporter: Laurie J. Berg, CCR, RPR, CRR, CLR, CER

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 March 02, 2022

2

1

# A P P E A R A N C E S

2

3

Howard M. Cooper, Esquire

TODD & WELD LLP

4

One Federal Street

27th Floor

5

Boston, Massachusetts 02110

617.720.2626

6

hcooper@toddweld.com

(Present via videoconference.)

7

-and-

8

Suzanne M. Elovecky, Esquire

9

PARTRIDGE SNOW & HAHN, LLP

30 Federal Street

10

Boston, Massachusetts 02110

617.292.7900

11

selovecky@psh.com

(Present via videoconference.)

12

## COUNSEL FOR PLAINTIFF

13

Kathleen H. Klaus, Esquire

14

MADDIN, HAUSER, ROTH & HELLER, P.C.

28400 Northwestern Highway

15

2nd Floor

Southfield, Michigan 48034-1839

16

248.354.4030

kklaus@maddinhauser.com

17

(Present via videoconference.)

18

## COUNSEL FOR DEFENDANTS

19

## Also Present:

20

Father Georges F. de Laire

21

(Present via videoconference.)

22

Christine Niles, Esquire

(Present via videoconference.)

23

David Hanrahan, Legal Video Specialist

24

(Present via videoconference.)

Very Reverend Georges F. de Laire, J.C.B. (b)(6) Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 March 02, 2022

3

# I N D E X

DEPONENT: GARY MICHAEL VORIS

(Present via videoconference.)

EXAMINATION	PAGE
(BY ATTORNEY COOPER)	7

# E X H I B I T S

NO.		PAGE
Exhibit 1	NH Vicar Change Dogma Into Heresy, January 17, 2019, CM0042 to CM0184	74
Exhibit 2	Diocese of Manchester, Episcopal Vicar for Canonical Affairs, Let It Be Known, CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER, RCBM-000555 to RCBM-000556	210
Exhibit 3	NH-Based 'only Catholics go to heaven' group sanction by Church; aspiring nun allegedly held against her will, January 8, 2019 (four pages)	213
Exhibit 4	Handwritten Document, 2018, SBC - SPLC (one page)	214
Exhibit 5	Attacking The Good Guys Who Are Fighting Back, April 15, 2019, CM0081 to CM0084	223

Very Reverend Georges F. de Laire, J.C.B. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
March 02, 2022

4

E X H I B I T S

(continued)

NO.

PAGE

(Original exhibits marked electronically  
and retained with the transcript.)

**In the Matter of:**

*Very Reverend Georges F. de Laire, J.C.L. vs  
Gary Michael Voris, et al.*

---

*Gary Michael Voris*

*February 08, 2023*

---

*68 Commercial Wharf • Boston, MA 02110*

*888.825.3376 - 617.399.0130*

*Global Coverage*

*Magnals.com*



Very Reverend Georges F. de Laire, J.C.L. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW HAMPSHIRE  
3 CIVIL ACTION NO. 1:21-cv-00131-JL

4 -----X

5 VERY REVEREND GEORGES F. de  
6 LAIRE, J.C.L.,

7 Plaintiff,

8 v.

9 GARY MICHAEL VORIS, ANITA CAREY,  
10 ST. MICHAEL'S MEDIA a/k/a CHURCH  
11 MILITANT,

12 Defendants.

13 -----X

14 VIDEOTAPED 30(B)(6) DEPOSITION OF ST. MICHAEL'S MEDIA  
15 A/K/A CHURCH MILITANT BY GARY MICHAEL VORIS,  
16 AND GARY MICHAEL VORIS, INDIVIDUALLY, DAY 2

17 Conducted Remotely

18 2900 Hilton Road

19 Ferndale, Michigan

20 February 8, 2023

21 10:06 a.m. to 6:09 p.m.

22  
23  
24 Reporter: Laurie J. Berg, CCR, RPR, CRR, CLR, CER



Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

278

A P P E A R A N C E S

Suzanne M. Elovecky, Esquire  
PARTRIDGE SNOW & HAHN, LLP  
30 Federal Street  
Boston, Massachusetts 02110  
617.292.7900  
selovecky@psh.com  
(Present via videoconference.)

COUNSEL FOR PLAINTIFF

Kathleen H. Klaus, Esquire  
MADDIN, HAUSER, ROTH & HELLER, P.C.  
28400 Northwestern Highway  
2nd Floor  
Southfield, Michigan 48034-1839  
248.354.4030  
kklaus@maddinhauser.com  
(Present via videoconference.)

-and-

Neil B. Nicholson, Esquire  
NICHOLSON LAW FIRM, PLLC  
58 North State Street  
Post Office Box 41371 48034  
Concord, New Hampshire 03302-4137  
603.932.7872  
neil@nicholson-lawfirm.com  
(Present via videoconference.)

COUNSEL FOR DEFENDANTS

Also Present:

Father Georges F. de Laire  
(Present via videoconference.)

Christine Niles, Esquire  
(Present via videoconference.)

Luc-Bernard Val, Legal Video Specialist  
(Present via videoconference.)

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 February 08, 2023

279

# I N D E X

DEPONENT: GARY MICHAEL VORIS

(Present via videoconference.)

EXAMINATION	PAGE
(BY ATTORNEY ELOVECKY)	283

# E X H I B I T S

NO.	PAGE
Exhibit 6 E-mail Chain, Tuesday, April 14, 2020 9:43 AM, CONFIDENTIAL, CM 0955 to CM 0957	438
Exhibit 7 E-mail Chain, Monday, April 20, 2020 4:07 AM, CONFIDENTIAL, CM 0922 to CM 0930	442
Exhibit 8 E-mail Chain, Monday, April 23, 2018 11:42 AM, CONFIDENTIAL, CM 1284 to CM 1290	454
Exhibit 9 2023 Response to Request for Production of Articles, CM 0188 to CM 0691	471
Exhibit 10 Canonical Aid web Page, About Us (one page)	491

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 February 08, 2023

280

# E X H I B I T S

(continued)

NO.		PAGE
Exhibit 11	E-mail, Wednesday, January 15, 2020 1:56 PM and Attachment, CONFIDENTIAL, CM 1155 to CM 1160	544
Exhibit 12	Text Message Chain, 12:45, CONFIDENTIAL, CM 1334 to CM1335	552
Exhibit 13	St. Michael's Media a/k/a Church Militant Answers to Plaintiff's Second Set of Interrogatories (four pages)	560
Exhibit 14	E-mail Chain, Thursday, September 9, 2021 7:36 PM, CONFIDENTIAL, CM 0786	569

(Original exhibits marked electronically  
 and retained with the transcript.)

**In the Matter of:**

*Very Reverend Georges F. de Laire, J.C.L. vs  
Gary Michael Voris, et al.*

---

*Gary Michael Voris Vol III  
August 08, 2023*

---

*68 Commercial Wharf • Boston, MA 02110  
888.825.3376 - 617.399.0130  
Global Coverage  
Magnals.com*



Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

4

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEW HAMPSHIRE  
3 CIVIL ACTION NO. 1:21-cv-00131-JD

-----x

4 VERY REVEREND GEORGES F. de  
5 LAIRE, J.C.L.,

6 Plaintiff,

7 v.

8 GARY MICHAEL VORIS, ANITA CAREY,  
9 ST. MICHAEL'S MEDIA a/k/a CHURCH  
MILITANT,

10 Defendants.

11 -----x

12  
13  
14  
15 VIDEOTAPED DEPOSITION OF GARY MICHAEL VORIS, DAY 3

16 Conducted Remotely

17 2900 Hilton Road

18 Ferndale, Michigan

19 August 8, 2023

20 9:02 a.m. to 12:48 p.m.

21  
22  
23  
24 Reporter: Laurie J. Berg, CCR, RPR, CRR, CLR, CER

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

596

1 A P P E A R A N C E S

2

3 Howard M. Cooper, Esquire  
4 TODD & WELD LLP  
5 One Federal Street  
6 27th Floor  
7 Boston, Massachusetts 02110  
8 617.720.2626  
9 hcooper@toddweld.com  
10 (Present via videoconference.)

7

-and-

8

9 Suzanne M. Elovecky, Esquire  
10 PARTRIDGE SNOW & HAHN, LLP  
11 30 Federal Street  
12 Boston, Massachusetts 02110  
13 617.292.7900  
14 selovecky@psh.com  
15 (Present via videoconference.)

12

COUNSEL FOR PLAINTIFF

13

14 Kathleen H. Klaus, Esquire  
15 MADDIN, HAUSER, ROTH & HELLER, P.C.  
16 28400 Northwestern Highway  
17 2nd Floor  
18 Southfield, Michigan 48034-1839  
19 248.354.4030  
20 kklaus@maddinhauser.com  
21 (Present via videoconference.)

18

-and-

19

20 Neil B. Nicholson, Esquire  
21 NICHOLSON LAW FIRM, PLLC  
22 58 North State Street  
23 Post Office Box 41371 48034  
24 Concord, New Hampshire 03302-4137  
603.932.7872  
neil@nicholson-lawfirm.com  
(Present via videoconference.)

24

COUNSEL FOR DEFENDANTS

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

597

1 A P P E A R A N C E S

2 (continued)

3

4 Also Present:

5 Father Georges F. de Laire  
(Present via videoconference.)

6

Christine Niles, Esquire  
7 (Present via videoconference.)

8 Mira Donahue, Summer Intern, Todd & Weld LLP  
(Present via videoconference.)

9

10 Tyler Crotty, Legal Video Specialist  
(Present via videoconference.)

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 August 08, 2023

598

# I N D E X

DEPONENT: GARY MICHAEL VORIS

(Present via videoconference.)

EXAMINATION	PAGE
(BY ATTORNEY COOPER)	603
(BY ATTORNEY KLAUS)	793

# E X H I B I T S

NO.		PAGE
Exhibit 15	Correspondence, July 20, 2023 (one page)	610
Exhibit 16	Correspondence, December 26, 2019 (six pages)	612
Exhibit 17	E-mail, Wednesday, January 15, 2020 1:56 PM and Attachment, CONFIDENTIAL, CM 1155 to CM 1160	621
Exhibit 18	Correspondence, January 16, 2020 (five pages)	625
Exhibit 19	Complaint (41 pages)	628
Exhibit 20	Defendants' Answer and Affirmative Defenses (30 pages)	635



Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

599

# E X H I B I T S

(continued)

NO.		PAGE
Exhibit 21	Text Message Chain, 12:45, CONFIDENTIAL, CM 1334 to CM 1335	643
Exhibit 22	E-mail Chain, Thursday, August 26, 2021 1:37:00 PM, CONFIDENTIAL, CM 1548 to CM 1556	652
Exhibit 23	E-mail Chain, Thursday, September 9, 2021 7:36 PM, CONFIDENTIAL, CM 0786	688
Exhibit 24	E-mail Chain, Friday, September 10, 2021 7:44 PM, CONFIDENTIAL, CM 0773 to CM 0775	694
Exhibit 25	Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, 11/08/2021 (four pages)	700
Exhibit 26	Memorandum Order, June 13, 2022 (14 pages)	705
Exhibit 27	Defendants Gary Michael Voris, Anita Carey and St. Michael Media's Answer to First Amended Complaint and Affirmative Defenses (33 pages)	712

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

600

# E X H I B I T S

(continued)

NO.		PAGE
Exhibit 28	Originate Loan, Minutes of Directors Meeting of St. Michael's Media, Inc., May 10, 2022, CONFIDENTIAL, CM 1480	715
Exhibit 29	Loan Agreement, June 4, 2022, CONFIDENTIAL, CM 1481 to CM 1484	719
Exhibit 30	Entry of Default as to Marc Balestrieri, October 25, 2022 (one page)	733
Exhibit 31	Text Message Chain, November 26, 2022, CM 1547	734
Exhibit 32	Excerpt of Transcript, Brother Andre Marie Villarrubia, March 07, 2023 (12 pages)	738
Exhibit 33	Text Message, Me, 12:26 PM, Jun 15, CONFIDENTIAL, CM 1546	755
Exhibit 34	Text Message Chain, Thu, Jun 15, CM 1557 to CM 1559	772
Exhibit 35	SPLC, Southern Poverty Law Center, Hatewatch, Ultra-Orthodox Catholic Propaganda Outlet Pushes Anti-LGBT Agenda, August 17, 2018 (ten pages)	782

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

601

E X H I B I T S

(continued)

NO.		PAGE
Exhibit 36	SPLC Deems Christian Beliefs Hateful, February 3, 2021 (26 pages)	785
Exhibit 37	Return of Organization Exempt From Income Tax, Form 990, 2021 (29 pages)	786

(Original exhibits marked electronically  
and retained with the transcript.)

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

458

1 don't know if it's a video script or an article  
2 script, I can't remember.

3 MS. ELOVECKY: Okay. For the record,  
4 there -- there wasn't an article that was similar to  
5 this that was produced along with the other articles  
6 that were produced, purportedly having been either  
7 authored by or contributed to by Balestrieri, and I  
8 also searched the Church Militant website and wasn't  
9 finding this. It's -- it's not -- not really that  
10 relevant. Just for the purpose of the record, I  
11 haven't seen that it was published.

12 BY MS. ELOVECKY:

13 Q. But I'd like to just turn our attention to  
14 the e-mail. So if you look at the bottom of CM1284,  
15 which is on your screen now, Christine Niles states,  
16 "I will publish this under your pseudonym Tom Jones.  
17 Michael, do you want this up today?"

18 Did I read that correctly?

19 A. (Deponent viewing exhibit.) Yes, you did.

20 Q. And when you go up about to -- like one-third  
21 down the page, Ms. Niles corrects herself and says,  
22 "Sorry, I meant Tom Moore."

23 Do you see that?

24 A. (Deponent viewing exhibit.) Yes, I do.

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

459

1 Q. Okay. And so, do you know if Mr. Balestrieri  
2 ever did publish anything on the Church Militant  
3 website under the name Tom Moore?

4 A. I don't remember, but the Tom Moore name was  
5 a name he and I came up with very early on just to be  
6 able to refer to him, not in a publication fashion,  
7 but just to sorta keep his identity secret from, you  
8 know, people who would be interested in finding out  
9 where we were getting information from.

10 So there was a time -- I don't remember when  
11 we stopped doing it, but there was a time, for a very  
12 long time, where he was actually in my phone as Tom  
13 Moore.

14 Q. Okay. Now, if you go -- so I -- we just  
15 pointed out that e-mail a third of the page down from  
16 Ms. Niles, but I want to go the one below that, which  
17 was Monday, April 23rd, 2018, at 11:35 a.m.

18 Do you see that?

19 A. (Deponent viewing exhibit.) Yes, I do.

20 Q. Okay. All right. So I guess there, she's  
21 saying, "Isn't that the name you approved of with Mike  
22 Sherry?"

23 Did I read that correctly?

24 A. (Deponent viewing exhibit.) Yes, that's

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

460

1 correct.

2 Q. who is Mike Sherry?

3 A. He's our IT guy.

4 Q. Okay. And so, are you aware of  
5 Mr. Balestrieri ever publishing on the Church Militant  
6 website under the name Tom Jones, which was the m --  
7 the misstated one, right?

8 A. I -- yeah, I don't believe so.

9 Q. Okay. And then when you look at the top of  
10 the pa -- the top e-mail on the page, Mr. Balestrieri  
11 states, "After reflection, let's use the pseudonym and  
12 pen name of a purported priest to try and throw off  
13 the scent, like 'Rev. Michael X.'"

14 Did I read that correctly?

15 A. (Deponent viewing exhibit.) That's correct.

16 Q. Okay. And he did, in fact, publish under  
17 that name; isn't that right?

18 A. I believe so. I -- if you tell me so, yes,  
19 because I'm pretty sure I have a memory of that, but I  
20 don't -- I couldn't -- I'm under oath, I don't want to  
21 say that I know for certain, but I'm pretty sure  
22 that's correct.

23 Q. We will scroll through the articles that were  
24 produced and you'll see that that was the case, but

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

461

1 we'll --

2 A. Okay.

3 Q. -- look at it on the record. So --

4 A. I shall take your word.

5 Q. Well, you won't have to. I'll show you, so.

6 (Laughter.)

7 BY MS. ELOVECKY:

8 Q. And then he also states, "That way a lot of  
9 suspicion would be directed to all canonists in the  
10 U.S. called Michael --

11 A. (Deponent viewing exhibit.) Mm-hmm.

12 Q. -- plus it's a great patronal name, right"  
13 question mark.

14 Did I read that correctly?

15 A. (Deponent viewing exhibit.) Yes, you did.

16 Q. Okay. So do you have any understand -- well,  
17 when you received this e-mail, did you have any  
18 understanding of what he meant by to tro -- "try to  
19 throw off the scent"?

20 A. Well, sure, because the information that he  
21 is providing in this script is very sensitive  
22 information that bishops and chanceries keep very  
23 close to their vest for the obvious reason. And  
24 again, you have to kind of step outside of the e-mail

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

462

1 particular for a moment and look at the context.

2           The context is that the sacrament of marriage  
3 in the church and the Catholic teaching in the church  
4 is, if you are validly -- I'm sorry -- if you are  
5 married in the church, the presumption is it is a  
6 valid marriage and you are married until one of you  
7 dies.

8           The annulment process is engaged in by a  
9 couple who come to believe, rightly or wrongly, that  
10 they were never validly married. So -- and if they  
11 weren't validly married, then they're not married in  
12 the church. They might be civilly married, and that's  
13 disposed of with a divorce, but in the sacramental  
14 realm, they would be -- the marriage would have to be  
15 annulled.

16           So you approach the church, normally, your  
17 home diocese, and you say, I'm -- we or I am appealing  
18 my case or filing my case to have our marriage  
19 declared null and void, as in it never happened to  
20 begin with. Despite the fact that you may have, you  
21 know, a nice church wedding, a nice reception and  
22 honeymoon and you've had kids and the whole bit,  
23 something comes up, down the road, a piece of  
24 information arises in the course of the couple



Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

463

1 believing they are married, which raises the question  
2 in, at least one of their minds, hey, are we actually  
3 validly married?

4           So, for example, if -- if one party, husband  
5 or wife, knew at the time of the wedding, the  
6 marriage, that they never intended to have children  
7 and they withheld that information from their spouse,  
8 that's grounds for an annulment, because in Catholic  
9 teaching, for a marriage to be valid, there's a number  
10 of conditions, but one of them has to be, is -- that  
11 you have to be open to the -- you know, to having  
12 children.

13           Now, obviously, some marriages don't --  
14 whatever, there's health issues, that doesn't make the  
15 marriage invalid and null. It just means that the  
16 health reasons prevented it. But if you could get  
17 pregnant, you would have the baby or babies.

18           But if you walk into it with the intention of  
19 defying the church's teaching and you just keep that  
20 to yourself and you don't reveal it to either your  
21 husband or your wife and it comes out later on, that  
22 marriage is invalid.

23           So the injured party, who did want children,  
24 does want children, would go appeal to the church, to

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

464

1 the diocese and say, hey, here's my situation; she  
2 lied or he lied, whatever it is. And so, you know, I  
3 wanted children and they never did and they lied to me  
4 about it, so the church would grant the -- would grant  
5 the annulment, meaning the marriage never occurred,  
6 sacramentally, to begin with, so both parties are now  
7 free to go marry.

8           Those -- but there are also many abuses in  
9 the realm of people filing for annulments and many  
10 people in the church, including, for example,  
11 Cardinal Burke, who has given many talks on this topic  
12 around the country and at the Canon Law Society of  
13 America dinners and conferences, are -- many people  
14 are on the record as saying that the staffs in  
15 individual chanceries, when it comes to annulment  
16 cases, are ridiculously understaffed and very poorly  
17 educated, and they're handing out annulments like  
18 candy, meaning they shouldn't be doing them, but  
19 they're just -- they're overwhelmed and overworked and  
20 they have no idea what they're doing. They're  
21 completely incompetent.

22           So that's what we're -- that's what the point  
23 of this discussion he and I had was, and that's what  
24 this first article or script was pointing to. So you

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

465

1 might imagine, you know, living proof of the  
2 incompetence charge that half the dioceses are giving  
3 out an annulment to every single case that comes  
4 before them and then, of the remaining half, it's  
5 through the roof with them as well. That's quite a  
6 black eye on the part of the church.

7           And the only people who would know this  
8 information are the canonists themselves, like, in  
9 this case, Marc, and other canonists that we have  
10 discussed this with who -- besides Marc, who also  
11 agree with that take, that the -- they're -- they're  
12 loaded with incom -- I mean, Cardinal Burke has  
13 stood up -- stood up and given speeches about this.  
14 He's talked in the general, when he talks about that,  
15 but Marc and other canonists have given us the names  
16 of horrible -- many canonists, as a matter of fact,  
17 have given us the names of people working in the  
18 annulment area of various dioceses, multiple dioceses,  
19 and all of it lines up.

20           And the only way to prove that it lines up is  
21 to have these actual numbers, which the church doesn't  
22 want people seeing, because it makes the case that  
23 you're incompetent, you're screwing around with the  
24 sacraments, which is the life blood of the church,

Very Reverend Georges F. de Laire, J.C. 10(1)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

466

1 you're -- you bishops are not doing the job you should  
2 be doing.

3           So, you know, you're not keeping guard over  
4 people's souls and the -- and the authenticity of the  
5 sacraments and, you know, you're causing families to,  
6 you know, break up and, you know -- you know,  
7 fatherless kids and one thing after another and all  
8 the ills that fall from this sort of thing, well, it  
9 becomes pretty clear pretty fast why nobody who's  
10 relaying this information to us would want to have  
11 their name attached to it.

12           Q. And it's your testimony that you received  
13 this information from Mr. Balestrieri but also other  
14 -- also other canonists --

15           A. That's correct.

16           Q. -- is that correct?

17           A. That's correct, yes.

18           Q. Okay. And what is the purpose, if you  
19 know -- strike that.

20                   what was your understanding in April of 2018  
21 as to why publishing under a pseudonym was favorable  
22 to just publishing anonymously, such as with the  
23 Church Militant byline?

24           A. Because it proves that -- it -- it attaches a

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

467

1 -- an office to the material -- as in Reverend,  
2 attaches an -- an office to the material, which gives  
3 us a greater weight that it's actually authentic.

4 Q. And what is the office that the word  
5 "Reverend" implies?

6 A. Priest.

7 Q. But that's not true, is it?

8 A. What -- what's not true, Reverend?

9 Q. That Marc Balestrieri is a priest?

10 A. No, it's also true his name isn't Tom Moore  
11 or Michael X.

12 Q. So the purpose was to attach an office to the  
13 author of this article which was not genuine, correct?

14 A. Correct.

15 Q. Okay.

16 A. The -- our -- our concern wasn't the -- our  
17 concern was that, is the information accurate and is  
18 it authentic, as in it can be authenticated by  
19 somebody who knows and that is what we were going to  
20 do here, I don't know that we actually did it as you  
21 said, if this never actually made it to print. But  
22 anyway, yes, that would've been the -- that would've  
23 been my thinking, certainly, behind it.

24 Q. And there was no concern that the readership

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
February 08, 2023

468

1 was being misled to thinking that an article was being  
2 written by a priest when it was not --

3 A. No.

4 Q. -- is that accurate?

5 A. No. No. Yeah, that -- that is accurate.  
6 No, there wouldn't be -- again, it's the information.  
7 It's the story that matters.

8 I mean, you know, from a -- from a  
9 journalistic standpoint, I mean, think of the Pentagon  
10 papers or, you know, Deep Throat with Watergate or any  
11 of those things. The point is, even the -- even the  
12 fact-checkers at the New York Times had to make crap  
13 up when it came to the Russia, Russia, Russia stuff  
14 and to convince their public that the information was  
15 accurate, they attributed it to inside sources, when  
16 the whole thing was a pack of lies.

17 But nonetheless, in this case, we happen to  
18 know it wasn't lies, because not only was Marc, who  
19 was a person who had deep knowledge of this stuff, but  
20 also other canonists who were able to verify all of  
21 this information for us. So it's not a question of  
22 being deceptive about the author, it's a question  
23 about being accurate about the information from an  
24 authoritative source.

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

641

09:34a 1 Q. That were going on at -- in the February,  
09:35a 2 March and April time frame so that you could file your  
09:35a 3 answer.

09:35a 4 A. Well, I presume he was part of it, but I  
09:35a 5 don't know what --

09:35a 6 Q. Okay.

09:35a 7 A. -- communications they necessarily had with  
09:35a 8 each other.

09:35a 9 Q. So in any of the communications that he was  
09:35a 10 part of, was it made clear to Miss Klaus that Marc  
09:35a 11 Balestrieri was the author of the January 17th, 2019  
09:35a 12 article?

09:35a 13 A. By Mr. Balestrieri?

09:35a 14 Q. By anybody.

09:35a 15 A. I -- I don't have a specific memory of it.  
09:35a 16 But I mean, that's what the reality is. So --

09:35a 17 Q. So when --

09:35a 18 A. -- at some --

09:35a 19 Q. You would have told --

09:35a 20 A. -- point, I presume.

09:35a 21 Q. -- her, right?

09:35a 22 A. I'm sorry?

09:35a 23 Q. You all would have told her, correct?

09:35a 24 A. Sure. If you're asking me if I have a

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

642

09:35a 1 specific memory of what and who and when, the answer's  
09:35a 2 no, I don't.

09:35a 3 Q. Okay. But by the time you filed the answer,  
09:35a 4 it would've been m -- made clear amongst your group,  
09:35a 5 including Mr. Balestrieri, that he was the author of  
09:35a 6 the January 17th, 2019 article, correct?

09:35a 7 MS. KLAUS: Objection to form.

09:35a 8 You can answer.

09:35a 9 A. Ye -- I -- I don't know that this was a  
09:36a 10 question that we sat and hashed out, because we all  
09:36a 11 just knew it.

09:36a 12 Q. Okay. So is there any reason that you didn't  
09:36a 13 -- wouldn't have told Miss Klaus?

09:36a 14 A. I -- no. One way or the other, no.

09:36a 15 Q. So you would've been -- your group would've  
09:36a 16 been completely open with her, before the answer was  
09:36a 17 filed, that Marc Balestrieri was the actual author of  
09:36a 18 the article, right?

09:36a 19 A. I -- I -- I don't have a specific memory of  
09:36a 20 any of this because it wasn't a question. I don't  
09:36a 21 know of my -- in other words, my -- my answer to your  
09:36a 22 question is, I don't know that we all sat around in  
09:36a 23 some large room somewhere and discussed whether Marc  
09:36a 24 was the author of the article. We knew it. He knew



Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

654

1 to you and to Marc Balestrieri, correct?

2 A. (Deponent viewing exhibit.) Yes.

3 Q. And we -- if we could go below that, just a  
4 few minutes earlier, four minutes earlier, there's an  
5 e-mail from Christine Niles to Miss Klaus to you and  
6 Mr. Balestrieri, correct?

7 A. (Deponent viewing exhibit.) Yes.

8 Q. And it's fair to say that Mr. Balestrieri was  
9 participating in a conversation about your defense in  
10 this case, right?

11 A. (Deponent viewing exhibit.)

12 (Deponent reading under breath.) Marc is  
13 getting names -- sources for us in Rome -- wants to  
14 schedule a meeting --

15 (Reporter interruption.)

16 THE DEPONENT: I'm -- I'm sorry.

17 MR. COOPER: Mr. --

18 THE DEPONENT: I'm -- I'm reading --

19 MR. COOPER: It will be easier if you  
20 just read to yourself so the reporter doesn't have to  
21 struggle to hear you.

22 THE DEPONENT: Okay. I -- I'll read to  
23 myself.

24 (Deponent viewing exhibit.) Yes, this is --

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

655

1 in answer to your question, yes.

2 Q. And Mr. Balestrieri's part of the team,  
3 correct?

4 MS. KLAUS: Objection to form.

5 A. When you say "the team," what do you mean,  
6 "the team"?

7 Q. That he's working with you to cooperate in  
8 defending the lawsuit.

9 A. Yes.

10 Q. In other words, you asked him for his help  
11 and he volunteered it to you, correct?

12 A. Correct.

13 Q. And he did that on an ongoing basis, correct?

14 A. Correct.

15 Q. And you are asking him -- or your colleague,  
16 Miss Niles, asked him to turn over something called  
17 "the de Laire file," and you don't know whether he did  
18 that or not; is that fair?

19 A. Correct, yes.

20 Q. But he was at least telling you that he  
21 supposedly had a file, right?

22 A. I don't know. He's n -- he never said that  
23 to me, that I have a memory of.

24 Q. well, in those texts, he was telling

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

657

09:49a 1 Q. Okay. When did Mr. Balestrieri give you a  
09:49a 2 list of his source -- the names of his sources in  
09:49a 3 Rome?

09:49a 4 A. He has not.

09:49a 5 Q. Did you ever ask him why not?

09:50a 6 A. Yes.

09:50a 7 Q. And what was his response?

09:50a 8 A. They didn't want to be identified.

09:50a 9 Q. Okay. So as of August 2021, he told you that  
09:50a 10 he's "gathering names of sources for us in Rome,"  
09:50a 11 right?

09:50a 12 A. Yes.

09:50a 13 Q. And when did he report back to you that he  
09:50a 14 wasn't gonna give you a list?

09:50a 15 A. Mmm. I don't have a memory of that. I'm  
09:50a 16 sorry, I don't --

09:50a 17 Q. Now --

09:50a 18 A. -- I'm sorry, I answered your question  
09:50a 19 incorrectly.

09:50a 20 I don't have a memory of when he communicated  
09:50a 21 that. Of when he communicated that.

09:50a 22 Q. Okay. And you hadn't asked him for that list  
09:50a 23 before the articles were published, correct?

09:50a 24 A. Correct.

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

659

09:51a 1 A. This is August of '21? Ye -- oh. Ye --  
09:51a 2 there were meetings post this date, as far as I -- my  
09:52a 3 memory serves me, but I don't know if they were,  
09:52a 4 quote, the mee -- or a meeting of this. I don't know  
09:52a 5 if that -- if -- if -- the meetings we had subsequent  
09:52a 6 to this, I don't know what the timeline is.

09:52a 7 Yes, I -- I -- we met with Marc subsequent to  
09:52a 8 this e-mail, but I don't know if the meetings were  
09:52a 9 because of this and/or -- and there's a direct tie to  
09:52a 10 this e-mail and those meetings. I don't -- I don't  
09:52a 11 know one way or the other.

09:52a 12 Q. How many times did you meet with Marc  
09:52a 13 Balestrieri after August 26, 2021?

09:52a 14 MS. KLAUS: Objection to form.

09:52a 15 A. I believe it was twice, but --

09:53a 16 Q. And -- and --

09:53a 17 A. -- I'm not certain, but I believe it was  
09:53a 18 twice in person.

09:53a 19 Q. So let's talk about each of the meetings.  
09:53a 20 who attended the first meeting?

09:53a 21 A. Ahh, Miss Niles, Marc, Miss Klaus and me.

09:53a 22 Q. And where did that meeting take place?

09:53a 23 A. A little pub place -- a local pub place. I  
09:53a 24 don't remember the name of it.

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

660

09:53a 1 Q. What city was it located in?

09:53a 2 A. Ahh, I -- I'm not exactly certain. Madison  
09:53a 3 Heights. Troy. Somewhere in that neighborhood.  
09:53a 4 Suburban Detroit.

09:53a 5 Q. And how long did that meeting last?

09:54a 6 A. It was dinner. Ahh, I don't have a clear  
09:54a 7 memory. More than an hour.

09:54a 8 Q. And tell us who said what to whom at that  
09:54a 9 meeting.

09:54a 10 A. Oh, gosh. I -- I don't -- I -- I don't have  
09:54a 11 a clear enough memory of -- of the conversations to be  
09:54a 12 able to attribute specific lines to specific people  
09:54a 13 and specific responses. We were talking about the --  
09:54a 14 largely, about the case.

09:54a 15 Q. Tell us what was said that you can recall.

09:54a 16 A. That there were individuals that had  
09:55a 17 complaints about Father de Laire's performance in his  
09:55a 18 role -- his job duty roles. And because the cases  
09:55a 19 were canonical law cases, we would have to ask the  
09:55a 20 people if they -- if the -- the subject matter was  
09:55a 21 delicate, I believe it was marriage and annulment  
09:55a 22 cases, that we would have to ask them if their  
09:55a 23 information could be supplied in the case. I remember  
09:55a 24 that being one of the topics.

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

661

Q. Anything --

A. And --

Q. -- else?

A. -- that's the only clear memory I have of an  
actual back-and-forth discussion.

Q. Did Mr. Balestrieri provide you with any  
names?

A. No, that was the question. That -- that was  
--

Q. Did he --

A. -- what was at question. He had --

Q. Did he --

A. -- the files, their files, because he was --  
I don't know if he was still actively working on the  
case or not, but --

Q. Did --

A. -- he said --

Q. Did he have files with him?

MS. KLAUS: Can you finish -- let him  
finish his answer? He wasn't quite done.

MR. COOPER: I thought that he was done.

BY MR. COOPER:

Q. Go ahead, then.

A. He -- I'm sorry, I forget where I was

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

662

1 (laughs).

2 MS. KLAUS: Can you read back his answer?

3 BY MR. COOPER:

4 Q. He --

5 MR. COOPER: That's okay.

6 BY MR. COOPER:

7 Q. Did he have files with him?

8 MS. KLAUS: well, no, he needs to finish  
9 his answer, Howard.

10 MR. COOPER: Not -- we're not -- we're  
11 not delaying here.

12 MS. KLAUS: well, then you shouldn't cut  
13 him off --

14 BY MR. COOPER:

15 Q. Mr. --

16 MS. KLAUS: -- Howard.

17 BY MR. COOPER:

18 Q. Mr. Voris --

19 MS. KLAUS: So we're gonna --

20 BY MR. COOPER:

21 Q. -- did he have --

22 MS. KLAUS: -- move to strike that whole  
23 question and answer --

24 MR. COOPER: All right.

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

663

MS. KLAUS: -- since you weren't allowed  
to finish.

BY MR. COOPER:

Q. Mr. Voris, did he have any files with him?

A. Yes, he did.

Q. Okay. And did he have them on the table?

A. I -- I believe he had them in his hand. He  
reached into his bag, this little suitcase thing, and  
was holding them as, like, reference point, but I  
don't recall if he actually physically put them on the  
table. I don't recall.

Q. Did he give them to you or anyone that was  
with you?

A. I don't believe so, but...

Q. Have you now exhausted your memory as to what  
was discussed at the first meeting?

A. Yes, I have.

Q. I take it it was clear in that meeting that  
Marc Balestrieri was the author of the January 17,  
2019 article, correct?

A. Yes.

Q. And Miss Klaus attended that meeting,  
correct?

A. Yes.



Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

664

09:57a 1 Q. Tell us about the second meeting. When did  
09:57a 2 that happen?

09:57a 3 A. Ahh, I don't recall when it was. It was at  
09:58a 4 my house.

09:58a 5 Q. Who attended?

09:58a 6 A. The same four.

09:58a 7 Q. Miss Klaus was there as well?

09:58a 8 A. Correct.

09:58a 9 Q. How long did that meeting last?

09:58a 10 A. I don't have a specific memory. An hour,  
09:58a 11 maybe.

09:58a 12 Q. Tell us who said what to whom.

09:58a 13 A. Well, the one thing that I remember  
09:58a 14 specifically was what I said to Marc when he said his  
09:58a 15 sources in Rome were reluctant to go on the record,  
09:59a 16 and I responded to him, well, then they need to go on  
09:59a 17 the record.

09:59a 18 And I said something to the effect of, you're  
09:59a 19 telling me these guys in Rome wouldn't sign an  
09:59a 20 affidavit? I don't think somebody's going to subpoena  
09:59a 21 a member of the Curia to fly over to New Hampshire to  
09:59a 22 testify that they had said or made these observations  
09:59a 23 or formed these professional opinions about  
09:59a 24 Father de Laire, so you need to go back to them.

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

665

09:59a 1 Q. Have you finished your answer?

09:59a 2 A. Yes.

09:59a 3 Q. What else was discussed during the meeting?

09:59a 4 A. That if Marc -- I don't know if this was that  
09:59a 5 meeting or not. I -- I can't recall specifically.

09:59a 6 Q. Can you call -- recall generally anything  
09:59a 7 else that was discussed?

09:59a 8 A. The overall theme was, I need your sources,  
10:00a 9 Marc.

10:00a 10 Q. Are you able to recall anything else that was  
10:00a 11 discussed?

10:00a 12 A. Not with any specificity. That was the --  
10:00a 13 that was the reason for the meeting, as I recall.

10:00a 14 Q. What about generally? Do you recall anything  
10:00a 15 else?

10:00a 16 A. Marc was bothered, I guess, that he might be  
10:00a 17 identified as the author of the article.

10:00a 18 Q. Why did you understand he was bothered?

10:00a 19 A. It -- he -- he -- he said, I -- something to  
10:00a 20 the effect of, you know, it can't be revealed. This  
10:01a 21 was the po -- this was his and my back-and-forth, it's  
10:01a 22 when I said you need to -- you know, you need to get  
10:01a 23 your sources to go on the record. And he said, well,  
10:01a 24 I'm not sure that they want to, or I -- I've asked

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

666

10:01a 1 them and they -- they were hesitant or something like  
10:01a 2 that. And -- and I pushed him and said, well, you  
10:01a 3 know, Marc, these are your sources and if they won't  
10:01a 4 step up, well, then you have to.

10:01a 5 Q. And how did he respond to that?

10:01a 6 A. He was worried about his career, said, I  
10:01a 7 can't be seen as being -- you know, writing and -- or  
10:01a 8 maybe not writing, strike that. I don't know exactly  
10:01a 9 how he responded and I don't want to put words in his  
10:01a 10 mouth. But he didn't want to be identified as the  
10:01a 11 author of the article.

10:01a 12 And I said, well, that -- you know, the  
10:01a 13 agreement here, this -- just the way this goes is, if  
10:02a 14 you provide the sources, then you're not, so go back  
10:02a 15 to Rome or hop on the phone with them or do whatever  
10:02a 16 it is and get them to say, you -- you know, sign their  
10:02a 17 affidavit or whatever it is they need to do to say  
10:02a 18 that they were your sources on this and this is what  
10:02a 19 they said.

10:02a 20 Q. Were you forceful --

10:02a 21 A. And he said --

10:02a 22 Q. I'm sorry, go ahead.

10:02a 23 A. And he said something to the fact of, well,  
10:02a 24 I'll try it again. And I said, well, yeah, you should

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

667

1 try it again.

2 Q. Were you forceful with Mr. Balestrieri in  
3 demanding that he provide his sources?

4 A. Yes.

5 Q. Did the conversation get heated?

6 (Pause.)

7 A. It was forceful. I don't know if --

8 Q. Well --

9 A. -- heated. I mean, "heated," in my mind, is,  
10 you're calling each other names and screaming and  
11 stuff.

12 Q. Like when you're calling someone a liar,  
13 right, that would be heated?

14 A. Well, I -- I don't know if it'd be heated if  
15 you just make a mention of, say, you know, you're a  
16 liar, as opposed to you're sort of screaming and  
17 bearing your teeth. I mean, this is all sort of  
18 subjective.

19 Q. Did anyone raise their voice?

20 A. I raised my voice.

21 Q. Did Mr. Balestrieri raise his voice?

22 A. I -- I don't recall.

23 Q. And Miss Klaus was in attendance for all of  
24 this?

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

668

10:03a 1 A. Yes, she was.

10:03a 2 Q. Umm --

10:03a 3 A. I'm sorry.

10:03a 4 Q. What --

10:03a 5 A. I'm s -- I'm sorry. Wait.

10:03a 6 There was a period where both she -- not  
10:03a 7 together, but both she and Christine had -- were not  
10:03a 8 in the room. They'd gone to the bathroom. They'd,  
10:03a 9 you know, maybe taken a phone call or a text or  
10:03a 10 something. So, no, I can't say for certain for  
10:03a 11 certain that either Christine or Miss Klaus were in  
10:03a 12 the room during that exchange. I don't have a clear  
10:03a 13 memory one way or the other.

10:03a 14 I do remember that people, including me, had  
10:03a 15 to get up and leave the -- my -- it was in my front  
10:04a 16 room and I had to go to the back room and, you know,  
10:04a 17 answer a phone call and, you know, got a text and that  
10:04a 18 sort of thing, and that was happening with them also  
10:04a 19 as well as going to the bathroom.

10:04a 20 So I don't recall who was actually there at  
10:04a 21 what time during what exchange. But the overall  
10:04a 22 meeting was the four of us, but n -- I don't think any  
10:04a 23 of the four of us were in 100 percent attendance for  
10:04a 24 all of it.

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

669

10:04a 1 Q. Have you now told us everything you can  
10:04a 2 recall about the second meeting?

10:04a 3 A. Yes.

10:04a 4 Q. Now, at either of the two meetings, did you  
10:04a 5 observe anyone taking notes?

10:04a 6 A. I -- I don't have a memory of that one way or  
10:04a 7 the other.

10:04a 8 Q. Did you observe Miss Klaus taking notes?

10:04a 9 A. Same answer.

10:04a 10 Q. You referred to an agreement that you had  
10:04a 11 with Mr. Balestrieri.

10:04a 12 what agreement were you referring to?

10:04a 13 A. That he had his sources, and if they needed  
10:05a 14 to step up, they would.

10:05a 15 Q. When did you reach that agreement with him?

10:05a 16 A. Ahh, don't -- I don't have a clear memory of  
10:05a 17 that.

10:05a 18 Q. What year was it that you reached an  
10:05a 19 agreement with him that his sources would step up, if  
10:05a 20 necessary?

10:05a 21 A. I don't recall.

10:05a 22 Q. You -- you can't even put it in a year?

10:05a 23 A. No, I can't.

10:05a 24 Q. Was it before or after the lawsuit was filed?

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

715

1 differently.

2 The board of directors of St. Michael's Media  
3 approved a loan of Mr. Balestrieri of \$65,000,  
4 correct?

5 A. Correct. As that stands, yes.

6 Q. And that happened on May 10th, 2022, correct?

7 A. I believe that's the correct date, yes.

8 MR. COOPER: And why don't we mark that  
9 as the next exhibit in order, please.

10 (Exhibit 28 marked for identification.)

11 MS. KLAUS: Can't get through that.

12 A. (Deponent viewing exhibit.) Yes --

13 MS. KLAUS: [Indiscernible].

14 A. -- that's correct.

15 Q. It is Bates-stamped CM 1480.

16 MR. COOPER: If we could just shrink it a  
17 little bit.

18 MS. ELOVECKY: (Complied.)

19 BY MR. COOPER:

20 Q. You see that?

21 A. (Deponent viewing exhibit.) Yes. That's  
22 correct.

23 Q. And you signed -- that's your signature on  
24 this page, correct?

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

716

11:05a 1 A. (Deponent viewing exhibit.) That's correct.

11:05a 2 Q. And this was in the middle about arguing

11:05a 3 about the disclosure of Mr. Balestrieri as the author

11:05a 4 of the article and whether he could be added as a

11:05a 5 defendant in the case, correct?

11:05a 6 MS. KLAUS: Objection to foundation.

11:05a 7 A. (Deponent viewing exhibit.) It -- sure,

11:05a 8 there was a coincidence of time. There was a --

11:05a 9 Q. I --

11:05a 10 A. -- there was a primary going on as well. It

11:05a 11 had as much to do with this as anything. They're not

11:05a 12 related.

11:05a 13 Q. You -- you can make -- let me just ask you to

11:05a 14 focus on -- my question was just about the timing.

11:06a 15 You knew in May of 2022 that Father de Laire

11:06a 16 was seeking to add Mr. Balestrieri as a defendant in

11:06a 17 this case.

11:06a 18 we've already discussed that, right?

11:06a 19 A. I knew it in the sense that I was aware. It

11:06a 20 had no front-of-my-mind connection to this.

11:06a 21 Q. Okay. Because it's all just a coincidence.

11:06a 22 That's your testimony, right?

11:06a 23 A. That is absolutely correct, and I resent --

11:06a 24 Q. Okay.



Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

748

11:38a 1 Q. Didn't you tell us earlier this morning that  
11:38a 2 you got a call at home from Kate Klaus on June 15th  
11:38a 3 of 2023?

11:38a 4 A. Yes.

11:38a 5 Q. Okay. And -- so which is it, were you on a  
11:39a 6 plane or did you get a call from Miss Klaus at home?

11:39a 7 A. As I testified before under oath, she called  
11:39a 8 me while I was packing for the trip --

11:39a 9 Q. I see.

11:39a 10 A. -- to tell me nothing more than Marc had  
11:39a 11 shown up. I -- I -- if I recall -- I think, if I  
11:39a 12 recall correctly, he had sent a note to the Court --  
11:39a 13 or an e-mail, sorry, to the Court, I think, the night  
11:39a 14 before, saying he wanted to show up or was gonna show  
11:39a 15 up and he was gonna be late.

11:39a 16 And I -- I -- I don't know, I was just  
11:39a 17 getting the stuff as I was packing. And -- and -- and  
11:39a 18 then, later on, I went, obviously, almost immediately  
11:39a 19 went to the airport and, you know, got on the plane or  
11:39a 20 was waiting in the airport and everything and -- and  
11:39a 21 that's the order of events.

11:39a 22 When I came to have detail told to me that  
11:39a 23 there was a scheduled deposition, it was going to be  
11:39a 24 on, I don't know, whatever the date was, July 10th,

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

749

11:40a 1 12th, whatever the date -- the agreed-upon date was  
11:40a 2 and that it was going in Boston and all of that, when  
11:40a 3 I came to know that specificity, I'm not entirely  
11:40a 4 clear. I presume --

11:40a 5 Q. well --

11:40a 6 A. -- it would've been sometime over the next  
11:40a 7 few days.

11:40a 8 Q. On June 15th of 2023, you wrote a text  
11:40a 9 directed at Marc Balestrieri, correct?

11:40a 10 A. That's correct.

11:40a 11 Q. And you sent it to him, but you also asked an  
11:40a 12 intermediary to forward it to him as well, correct?

11:40a 13 A. I did not s --

11:40a 14 MS. KLAUS: Objection.

11:40a 15 A. No, I did not send to him.

11:40a 16 Q. Yeah. Okay. So you asked an intermediary to  
11:40a 17 send it to him?

11:40a 18 A. Correct.

11:40a 19 Q. Okay.

11:40a 20 A. I didn't have any of Marc's contact  
11:40a 21 information, phone numbers, texts or nothing. I  
11:40a 22 didn't have --

11:40a 23 Q. And that was the date --

11:40a 24 A. -- any of that.

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

750

1 (Whereupon, parties speaking at the same  
2 time.)

3 (Reporter interruption.)

4 THE DEPONENT: I didn't have any of that.

5 MADAM COURT REPORTER: Thank you.

6 BY MR. COOPER:

7 Q. That was the date -- well, didn't we just see  
8 a text between you and him about the \$70,000 that he  
9 owes?

10 A. That was from November.

11 Q. So you didn't --

12 A. That was four or five months prior.

13 Q. So you didn't think it was appropriate to  
14 send your message to that number?

15 A. That's correct. Yes, I did not, because I  
16 knew that -- he hadn't responded to that. And as  
17 background on this, since you're opening --

18 Q. No. I'm not interested in background.

19 A. Well, you're --

20 Q. Answer --

21 A. No, you -- no, you've --

22 Q. -- the question.

23 A. -- you've -- you've said something that needs  
24 a --

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

751

Q. No, it --

A. -- response.

Q. Sir. Sir. S -- moving on to the next  
question.

A. No. So I don't --

Q. You wrote to Mr. --

A. Can I fini --

Q. -- Moore --

A. Can I finish my answer, please?

Q. No, you really can't because you're not  
answering my question.

A. I am answering your --

MS. KLAUS: Let him finish --

A. -- question.

MS. KLAUS: -- Howard. Just let him get  
his --

BY MR. COOPER:

Q. Mr. --

MS. KLAUS: -- answer out.

BY MR. COOPER:

Q. Mr. Voris, on June 15th --

THE DEPONENT: Did we get --

BY MR. COOPER:

Q. -- at 12:26 p.m., did you write the

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

752

11:41a 1 following: "Marc," meaning Marc Balestrieri, "you are  
11:41a 2 committing perjury."

11:41a 3 Did you write that?

11:41a 4 A. Yes, I did.

11:41a 5 Q. And you wrote that with the intent that that  
11:42a 6 message be delivered to him, correct?

11:42a 7 A. That's correct.

11:42a 8 Q. And you asked someone to deliver that to him,  
11:42a 9 correct?

11:42a 10 A. That's correct.

11:42a 11 Q. And what's that person's name?

11:42a 12 A. I don't remember if I asked Christine Niles  
11:42a 13 to get it to him. I can't remember if I asked her  
11:42a 14 directly or asked her to get it to Father PJ because  
11:42a 15 he had numbers that Marc answered. And I don't know  
11:42a 16 if another -- if the other numbers Marc just wasn't  
11:42a 17 answering anymore.

11:42a 18 I had been in contact -- well (laughs), I was  
11:42a 19 in contact with Marc during the summer of 2022 and --  
11:42a 20 I'm sorry -- 2023, after we'd made the loan to him and  
11:42a 21 said -- sorry -- 2022, I mixed the summers up -- and  
11:43a 22 said, you know, you're not responding to -- you're not  
11:43a 23 responding to, when are you going to be paying the  
11:43a 24 money back, you know, you signed the note? I'm not

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

753

11:43a 1 hearing anything from you.

11:43a 2 This stuff went on and on and on and on and  
11:43a 3 he never responded to anything at all. So that's why  
11:43a 4 I went the intermediary route of saying that, well, I  
11:43a 5 do know that Father PJ has his -- is in communication  
11:43a 6 with him because he and Father PJ have a separate  
11:43a 7 case, canon law case of Father PJ's, again, that has  
11:43a 8 nothing to do with this case, and so I knew that he  
11:43a 9 had -- that they were going back and forth on his  
11:43a 10 case.

11:43a 11 But he had never responded to -- as far as I  
11:43a 12 know -- he had never responded for months to anything  
11:43a 13 to Kate. He had never responded to -- about the case.  
11:43a 14 He'd never responded to me for months and months about  
11:43a 15 anything about paying back the loan. So I had no idea  
11:44a 16 whether those numbers were still functioning. I just  
11:44a 17 presumed they either were and he just ignored them or,  
11:44a 18 for whatever reason, they weren't because he used to  
11:44a 19 switch out phone numbers like most guys change out  
11:44a 20 baseball hats.

11:44a 21 So I asked that the text be funneled -- my  
11:44a 22 text, that text you read part of there, be funneled to  
11:44a 23 him in the -- in a way I knew he would actually  
11:44a 24 receive it. And that was --

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

756

11:46a 1 A. I believe Los Angeles.

11:46a 2 Q. And what airline were you flying?

11:46a 3 A. Delta.

11:46a 4 Q. Now, the text goes on to say, "You know you  
11:46a 5 write that article. What you don't know is this  
11:46a 6 morning we found proof - your digital fingerprints -  
11:46a 7 all totally documented - on that article."

11:46a 8 Have I read that correctly?

11:46a 9 A. (Deponent viewing exhibit.) Yes, you have.

11:46a 10 Q. So, by virtue of what you say there, is it  
11:46a 11 fair to say that you had learned earlier in the day  
11:46a 12 that his deposition was gonna be taken, that he -- in  
11:47a 13 your view, he would be committing perjury, and you had  
11:47a 14 asked someone to go find proof that he had written the  
11:47a 15 article?

11:47a 16 A. Correct. I don't know that he was going to  
11:47a 17 -- I don't recall specifically if I knew he was going  
11:47a 18 to be deposed, because I was unclear about what he was  
11:47a 19 doing in New Hampshire on that day. I -- I don't -- I  
11:47a 20 don't recall what the New Hampshire hearing event was  
11:47a 21 about, but that Marc had showed up and said he wanted  
11:47a 22 to -- I -- I don't know, said something like, both  
11:47a 23 sides have stuff wrong, or however he phrased it, and  
11:47a 24 he wanted to go on the record and testify and the drug

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

757

1 -- the judge was befuddled and -- I knew all of that.

2           So I don't know if this was -- he was -- I  
3 don't know at the moment I wrote this whether I  
4 understood that he was going to say something that day  
5 inside the courtroom at whatever that hearing was or  
6 at least thought he was going to, or if this is in  
7 reference to the fact that I had already known,  
8 although I don't know, that there was a scheduled  
9 deposition.

10           I don't remember what it was, but it was --  
11 that was not top of my mind. Top of my mind was that  
12 he was going to say that he hadn't -- or I had -- top  
13 of mind was my fear that he was going to say that he  
14 hadn't written the article. And it was --

15           Q. And --

16           A. -- it was at this point that it came back to  
17 me that Brother Andre had said that Marc denied  
18 writing the article.

19           Q. So one of the things that was flashing  
20 through your mind that was he was physically in the  
21 courthouse, going to the courtroom, and you were  
22 concerned that he might testify that he hadn't written  
23 the article?

24           A. That's correct.



Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

759

11:50a 1 always being worried that his providing information --  
11:50a 2 sometimes extraordinarily sensitive information -- on  
11:50a 3 all kinds of cases that that -- that he was always  
11:50a 4 very squirrely about any of that being found out.

11:50a 5 And when he wrote articles for us, provided  
11:50a 6 information to other people as well, but certainly to  
11:50a 7 us on ongoing cases, you know, before whatever  
11:50a 8 individual, tribunal, or whatever congregation in  
11:50a 9 Rome, that all of his association as a very  
11:50a 10 highly-placed, well-respected vatican source would  
11:51a 11 come out. He was always -- for obvious reasons,  
11:51a 12 because of retaliation and, you know, not being able  
11:51a 13 to be employed somewhere down the road and, you know,  
11:51a 14 not viewed as trustworthy by, you know, individuals in  
11:51a 15 the church who would care about that sort of thing.

11:51a 16 So anyway, that's the gist of that, yes.

11:51a 17 Q. So you threatened him?

11:51a 18 A. With --

11:51a 19 MS. KLAUS: Objection to form.

11:51a 20 A. With telling the truth.

11:51a 21 Q. So you threatened him?

11:51a 22 A. With telling the truth. Stop characterizing  
11:51a 23 it as though I was trying to get him to do something  
11:51a 24 wrong. I was trying to get --

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

763

12:06p 1 record. The time is 12:06 p.m.

12:06p 2 BY MR. COOPER:

12:06p 3 Q. Mr. Voris, we still have Exhibit 33 up in  
12:06p 4 front of you.

12:06p 5 Do you have it?

12:06p 6 A. (Deponent viewing exhibit.) Yes, I do.

12:06p 7 Q. Now, I want to ask you a couple of things  
12:06p 8 about something you just said. You say in this text  
12:06p 9 that it was that morning, June 15th, 2023, that you  
12:06p 10 found proof, digital fingerprints, that  
12:06p 11 Mr. Balestrieri was the author of the article.

12:06p 12 Do you see that?

12:06p 13 A. (Deponent viewing exhibit.) Yes, I do.

12:06p 14 Q. And you told us that you had directed people  
12:06p 15 at Church Militant -- Militant to find that proof that  
12:06p 16 day, correct?

12:06p 17 A. Correct.

12:06p 18 Q. And was that the first time you ever directed  
12:07p 19 anybody to do that?

12:07p 20 MS. KLAUS: Objection to form.

12:07p 21 A. To do what?

12:07p 22 Q. To go find proof that Mr. Balestrieri was the  
12:07p 23 author of the article.

12:07p 24 A. Correct, because it had not come up before

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

764

12:07p 1 that.

12:07p 2 Q. In your mind, correct?

12:07p 3 A. Well, correct, yes, my mind.

12:07p 4 Q. But you weren't -- you weren't following the  
12:07p 5 day-to-day in the lawsuit, you told us, right?

12:07p 6 A. That's correct.

12:07p 7 Q. So you don't know whether it had come up in  
12:07p 8 the lawsuit previously, right?

12:07p 9 MS. KLAUS: Objection to form.

12:07p 10 A. I -- I knew, as I said earlier, that  
12:07p 11 Brother Andre had said in his deposition that Marc  
12:07p 12 had denied writing the article. I knew that, as I  
12:07p 13 said, and really paid no attention to it because I  
12:07p 14 just -- I don't know why I didn't pay any attention to  
12:07p 15 it, beyond just knowing that I knew it wasn't true, so  
12:07p 16 I just moved on with my life.

12:07p 17 Q. And --

12:07p 18 A. But when --

12:07p 19 Q. My question's a little bit different,  
12:08p 20 respectfully, Mr. Voris.

12:08p 21 My question is, you would agree with me that  
12:08p 22 you never directed anybody at St. Michael's Media's to  
12:08p 23 go looking for proof that Mr. Balestrieri wrote the  
12:08p 24 article until June 15th of 2023, right?

Very Reverend Georges F. de Laire, J.C.L. v Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

765

12:08p 1 A. I'm sorry, I thought I understood your  
12:08p 2 earlier question to say "in my mind," which is why I  
12:08p 3 was explaining --

12:08p 4 Q. No.

12:08p 5 A. -- my mind.

12:08p 6 Q. No. I'm simply asking you whether you ever  
12:08p 7 gave the direction that you gave on June 15th, 2023,  
12:08p 8 before that.

12:08p 9 A. To go find proof that Marc had actually  
12:08p 10 authored the article? That is --

12:08p 11 Q. Yes, sir.

12:08p 12 A. That is correct. Yes, I had never given that  
12:08p 13 instruction because it had never been a -- at  
12:08p 14 question.

12:08p 15 Q. And as far as you knew, no one else at  
12:08p 16 St. Michael's Media had ever undertaken that effort  
12:08p 17 prior to June 15th of 2023, correct?

12:08p 18 A. Yes, correct. I don't know why they would  
12:09p 19 have done that. Again, that was never --

12:09p 20 Q. And --

12:09p 21 A. -- at question.

12:09p 22 Q. And as far as you know, your lawyers never  
12:09p 23 undertook that effort --

12:09p 24 A. Once again --

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

766

12:09p 1 Q. -- at any time?

12:09p 2 A. -- never at question.

12:09p 3 Q. Okay. But you agree with me that they never  
12:09p 4 undertook that effort?

12:09p 5 A. That -- that's correct, never at question.

12:09p 6 Q. Now, you say in here, I had just asked you  
12:09p 7 about, "You go thru with this and we will rain down on  
12:09p 8 you publicly."

12:09p 9 Do you see that?

12:09p 10 A. (Deponent viewing exhibit.) Yes, I do.

12:09p 11 Q. And then you say, "You are a liar, and a  
12:09p 12 welch."

12:09p 13 Let's take tho -- you -- you -- you do admit  
12:09p 14 writing that, correct?

12:09p 15 A. That's correct.

12:09p 16 Q. And sending that to Mr. Balestrieri on  
12:09p 17 June 15th of this year, correct --

12:09p 18 A. well --

12:09p 19 Q. -- through an intermediary?

12:09p 20 A. Through two intermediaries.

12:09p 21 Q. Okay. Through two intermediaries.

12:09p 22 A. And --

12:09p 23 Q. well, you know he got it, right?

12:09p 24 A. (Deponent viewing exhibit.) And -- and f --

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

788

1 And then at the end of the quarter, we send  
2 them over that information and they collect it as we  
3 move along through in -- through the year. And then  
4 -- and I think they do -- I think they do payroll for  
5 us also. I can't recall right now. Or at -- or at  
6 one time they did. I don't recall.

7 Q. When does St. Michael's Media intend to file  
8 its Form 990 for 2022?

9 A. I think our extension is through October. We  
10 don't actually ask for the extension. The accountants  
11 just tell us they're gonna -- that -- that's got --  
12 that's been the case, I think -- I think every year.

13 I don't know when they're due. I think  
14 corporate returns, or at least 990s, I think, are due  
15 at the end of July of each year. But from what I  
16 understand from the accountants, it's just standard  
17 operating procedure that virtually every corporation  
18 -- at least nonprofits -- just kind of automatically  
19 file for an extension until I think it's the end of  
20 October. So I would presume that's the case here as  
21 well for --

22 Q. When you --

23 A. -- 2022.

24 Q. When you wrote your e-mail [sic] directed at

Very Reverend Georges F. de Laire, J.C.L. v/Videotaped  
Gary Michael Voris, et al.

Gary Michael Voris  
August 08, 2023

789

1 Mr. Balestrieri on June 15th of this year, that we  
2 looked at exhibit -- as Exhibit 33, what was your  
3 emotion that you were feeling?

4 MS. KLAUS: Objection to form.

5 A. I was troubled that he was going to perjur  
6 himself. First of all, that's a sin to take an oath  
7 before God and then lie. It's a mortal sin, which is  
8 in the category of pretty darn bad in Catholicism.

9 And that Marc, who has probably racked up the  
10 reputation of being one of the ten best canonists on  
11 the planet, would consider -- at least in my mind, he  
12 was going to consider getting up and perjuring  
13 himself, and thus, committing a mortal sin was, Marc,  
14 don't be stupid. Don't do this. You're perjuring  
15 yourself. You're lying. You know, what's wrong with  
16 you? That's what was in my mind when I was sending  
17 the text.

18 It was a text, by the way. You represented  
19 it as an e-mail.

20 Q. Were you angry?

21 A. Ahh, I -- I -- I don't know. Like -- as I  
22 said, troubled, bothered. You know, why would you do  
23 this? This -- the "this" being perjur yourself and  
24 not tell the truth about writing the article.

Very Reverend Georges F. de Laire, J.C. (b)(6) Videotaped  
 Gary Michael Voris, et al.

Gary Michael Voris  
 February 08, 2023

592


COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

I, Laurie J. Berg, Certified Court Reporter,  
 Registered Professional Reporter, Certified Realtime  
 Reporter, Certified LiveNote Reporter, Certified  
 eDepoze Reporter and Notary Public, in and for the  
 Commonwealth of Massachusetts, do hereby certify that  
 pursuant to appropriate notice of taking deposition,  
 there remotely appeared before me the following named  
 person, to wit: GARY MICHAEL VORIS, who was by me  
 duly sworn; that he was thereupon examined upon his  
 oath and his examination reduced to writing by me; and  
 that the deposition is a true record of the testimony  
 given by the witness.

IN WITNESS WHEREOF, I have hereunto set my  
 hand and seal this 20th day of February, 2023.

My commission expires:  
 September 14, 2023




---

Notary Public